

LAW OFFICES OF JOEL B. RUDIN, P.C.

CARNEGIE HALL TOWER
152 WEST 57TH STREET
EIGHTH FLOOR
NEW YORK, NEW YORK 10019

TELEPHONE: (212) 752-7600
FACSIMILE: (212) 980-2968
E-MAIL: jbrudin@rudinlaw.com

JOEL B. RUDIN
HARAN TAE
JACOB "COBY" LOUP
MATTHEW A. WASSERMAN

GEORGE R. GOLTZER
(OF COUNSEL)
SIDURI BECKMAN
(PARALEGAL)

March 10, 2021

ECF

Honorable Diane Gujarati, District Judge
Honorable Roanne L. Mann, Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Negron v. City of New York et al.*
Case No. 18-cv-6645 (DG) (RLM)

Dear Judges Gujarati and Mann:

This office represents Plaintiff Julio Negron in this § 1983 action against individual officials and the City of New York alleging malicious prosecution, evidence fabrication, *Brady* violations, and summation misconduct. Plaintiff has obtained the written consent of Defendants to file an amended complaint in this matter. In accordance with Fed. R. Civ. P. 15(a)(2), Plaintiff is filing that amended complaint today. In addition, in accordance with Rule I(E) of Judge Gujarati's Individual Practice Rules, I have attached a copy of the amended complaint that shows in redline the changes made to Plaintiff's original complaint, Doc. 1.

Respectfully submitted,

/s/

Joel B. Rudin

Encls.

cc: Elissa Fudim (via ECF)
Morgan McKinney (via ECF)
Barry Myrvold (via ECF)
Attorneys for Defendants